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28 [Additional counsel appear on signature page]

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28 **UNITED STATES DISTRICT COURT**

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28 **DISTRICT OF NEVADA**

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28 Cung Le, Nathan Quarry, Jon Fitch, Brandon
Vera, Luis Javier Vazquez, and Kyle
Kingsbury on behalf of themselves and all
others similarly situated,

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28 Plaintiffs,

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23 vs.

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28 Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

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28 Defendant.

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28 Case No.: 2:15-cv-01045 RFB-(PAL)

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28 **PLAINTIFFS' STATEMENT OF
NON-OPPOSITION TO ZUFFA, LLC'S
MOTION TO SEAL (ECF NO. 541)**

1 Zuffa LLC's Motion to Seal Zuffa's Opposition to Plaintiffs' Motion to Certify Class and
2 Related Materials (ECF No. 541, the "Motion to Seal") asks the Court to seal documents that have
3 been designated CONFIDENTIAL or HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY by
4 Zuffa or third parties, and portions of documents that refer to such documents and information,
5 including Zuffa's Opposition to Plaintiffs' Motion for Class Certification (ECF No. 540) and expert
6 reports. Zuffa seeks to seal these documents on the basis that they purportedly contain highly
7 confidential and commercially sensitive information. Motion to Seal, at 2-5. Plaintiffs take no position at
8 this time as to whether the documents contain highly confidential or commercially sensitive
9 information, and do not oppose sealing the documents on the limited basis that they have been so
10 designated by Zuffa or third parties pursuant to Section 5 of the Revised Stipulation and Protective
11 Order (the "Protective Order"), signed by Magistrate Leen in this litigation on February 10, 2016. ECF
12 No. 217. However, Plaintiffs reserve their right to challenge any confidentiality designation pursuant to
13 Section 6 of the Protective Order, which states in relevant part, "[a]ny Party or Non-Party may
14 challenge a designation of "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL - ATTORNEYS'
15 EYES ONLY" at any time."

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1 Dated: April 20, 2018

Respectfully Submitted,

2 JOSEPH SAVERI LAW FIRM, INC.

3 By: /s/Kevin E. Rayhill
4 Kevin E. Rayhill

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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on this 20th day of April, 2018 a true and correct copy of **PLAINTIFFS'**
3 **STATEMENT OF NON-OPPOSITION TO ZUFFA, LLC'S MOTION TO SEAL (ECF NO.**
4 **541)** was served via the District of Nevada's ECF system to all counsel of record who have enrolled in
5 the ECF system.

6 By:

7 /s/ Kevin E. Rayhill
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